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TO: Department Heads
FROM: Kathleen N. A. Watanabe, Director
SUBJECT: First Aid Kit and First Aider Guidelines

A handwritten signature in black ink, appearing to read "Kathleen N. A. Watanabe", written over the printed name in the "FROM" field.

This memorandum supersedes the Department of Human Resources Development's Memorandum dated December 14, 1998, on First Aid Kit and First Aider Guidelines. Since 1998, the Occupational Safety and Health Administration's (OSHA) interpretation of the Standard for Medical Services and First Aid (29 CFR 1910.151) has changed.

Employers may use the American National Standards Institute's Standard on the Minimum Requirements for Workplace First Aid Kits (ANSI Z308.1-1998) (attached) or the State Department of Health's (DOH) recommendation to meet first aid kit requirements.

The revised First Aid Guidelines are attached. Should you have any questions, please contact me or have your staff contact Robert Nakamatsu of my Safety Office at 587-1060.

Attachments

c: Department Personnel Officers
Valerie Pacheco, HRD/ECD Chief

ECD/so:lc

First Aid Kit and First Aider Guidelines

Background: Although the Occupational Safety and Health Administration's (OSHA) Medical and First Aid Standards has not materially changed, its interpretation has changed considerably throughout the years. The Standard: **"In the absence of an infirmary, clinic, or hospital in near proximity to the workplace which is used for the treatment of all injured employees, a person or persons shall be adequately trained to render first aid. Adequate first aid supplies shall be readily available."** Except for infirmaries, clinics, or hospitals, it is almost impossible for most workplaces to meet this criterion.

The term "readily available" is not defined in the standard. However, responding in a timely manner can mean the difference between life and death. Therefore, the person who has been trained to render first aid must be able to quickly access the first aid supplies in order to effectively provide the injured or ill employee with medical attention.

In its renderings, it is evident that OSHA requires employers to have trained first aiders and first aid supplies. However, OSHA does not specify the number of first aiders required nor what constitutes a first aid kit. Therefore, it is incumbent upon the employer to determine the number of employees to be trained, taking into account past injuries, geographic dispersion of operations, and exposure to hazards.

First Aid Kits: Although OSHA does not specify what the contents of a first aid kit should contain, it references past injuries and defers to the American National Standards Institute's (ANSI) standard Z308.1 -1998, "Minimum Requirements for Workplace First Aid Kits" as a source of guidance for the minimum requirements for a first aid kit.

Attached is the ANSI Standard Z308.1 which identifies the basic kit with minimum fill requirements and other types of kits that OSHA has acknowledged for specific industries. What agencies should not do is enhance the first aid kit with drugs and medicinal ointments. The Department of Health advises against the inclusion of any medication, ointments, crèmes, sprays, and drugs, including over-the-counter products in first aid kits. The Department of Health (DOH) provides a sample of the minimum first aid kit requirements for a small office (attached).

First Aiders: OSHA recognizes a first aider as a person or persons who can give injured employees some level of medical attention as quickly as possible to bridge the gap between the accident and full medical treatment. Therefore, the rendering of first aid should be encouraged by trained employees in addition to calling "911." An employer would not be in violation of OSHA's First Aid standard by issuing a policy which recommends that employees call "911" in emergency situations as long as the policy does not discourage the rendering of first aid by trained employees.

Minimum First Aid Kit Requirements (DOH Recommendation)

	1-25 employees	over 25 employees
Contents	Number of Units	Number of Units
3 x 3-inch plain gauze pads	1	2
4 x 4-inch plain gauze pads	1	2
gauze roller bandage	1	1
½ - square-yard plain absorbent gauze	0	1
24-72-inch plain absorbent gauze	1	2
tape (to secure bandage)	1	1
cold packs	1	2
gloves (nitrile) – pair*	2	4
one-way valve mask (CPR barrier)	2	2

***CAUTION:** Department of Health advises the use of nitrile gloves.
(Latex may cause severe allergic reactions in some individuals.)